

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LAS AMERICAS IMMIGRANT
ADVOCACY CENTER; AMERICAN
GATEWAYS; and THE COUNTY OF EL
PASO, TEXAS,
Plaintiffs,

v.

Cause No. 1:23-cv-1537

STEVEN C. MCCRAW, in his official
capacity as Director of the State of Texas
Department of Public Safety, and BILL
HICKS, in his official capacity as District
Attorney for the 34th District,
Defendants.

CARL STARR'S MOTION TO INTERVENE

Carl Starr files this motion to intervene under a party plaintiff as per FRCP 24.

1. Plaintiff is Las Americas et al. Intervenor is Carl Starr.
2. Plaintiffs sued defendants re Texas SB 4 unconstitutionality.
3. This court has jurisdiction over this claim per 28 USC 1331/FRCP 24.

Argument

4. Starr asks to intervene under FRCP 24 b 2. Starr seeks to intervene because Starr has a federal settlement agreement with the County of El Paso eg that the county and sheriff will not enforce immigration laws 06 CA-0188-PRM. The lawsuit has a common question of law or fact with the Starr's settlement agreement with the county re unconstitutionality of SB 4. Please take judicial notice of Texas Civil Rights Project url link. 1

5. Starr motion is timely. Starr learned of the suit on 12/19/23 and filed this motion without delay as pro se layman. And granting this motion will not prejudice the parties.

6. The complaint in intervention is enclosed, should it be granted.

Conclusion

For above reasons Starr asks the motion be granted as a intervenor party plaintiff.

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<https://texascivilrightsreview.org/0006/06/06/el-paso-civil-rights-project-sues-border-enforcement/>

Respectfully Submitted,

Email carlstarr@gmail.com

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I Certify the forgoing is true and correct under penalty of perjury and further certify the forgoing was emailed to the plaintiffs and land mailed to the court and defendants.

Electronic Signed: \ Carl Starr \ 1-2-24

Carl Starr 1-2-24